

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION

TRAXCELL TECHNOLOGIES, LLC.,	)	
Plaintiff,	)	
	)	Civil Action No. 2:17-cv-00042
v.	)	Lead Consolidated Case
	)	
	)	
HUAWEI TECHNOLOGIES USA INC.,	)	JURY TRIAL DEMANDED
Defendant.	)	

**JOINT CLAIM CONSTRUCTION CHART**

Pursuant to Patent Rule 4-5(d) and the Court’s Docket Control Order, Plaintiff Traxcell Technologies, LLC (“Traxcell”) and Defendants Huawei Technologies USA, LLC (“Huawei”) and Nokia Solutions and Networks Oy and Nokia Solutions And Networks US LLC (“Nokia”) (“Defendants”) (collectively, “Parties”) hereby submit this Joint Claim Construction Chart. The exhibits to this pleading contain the disputed claim language for the patents-in-suit as follows:

- Exhibit A - U.S. Patent No. 8,977,284 (“’284 patent”);
- Exhibit B - U.S. Patent No. 9,510,320 (“’320 patent”); and,
- Exhibit C - U.S. Patent No. 9,642,024 (“’024 patent”).

These charts include the Parties’ proposed constructions for disputed terms only. The Parties agree to proposed constructions for the following terms.

Asserted Claims	Term	Agreed Construction
’284 patent – claim 1 (corrective action) ’284 Patent – claim 12 (correcting) ’320 Patent – claims 1 and 4 (corrective action)	corrective action / correcting	Plain and ordinary meaning should apply or no construction is necessary.

Asserted Claims	Term	Agreed Construction
'284 patent – claims 1 and 12	radio tower	base station transceiver subsystem and associated antenna(s)

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

Pursuant to the Federal Rules of Civil Procedure and Local Rule CV-5, I hereby certify that all counsel of record who have appeared in this case are being served today, November 28, 2018, with a copy of the foregoing via e-mail to counsel of record.

/s/ William P. Ramey, III

William P. Ramey, III